

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

ACCESS 4 ALL, INC., a Not-for-Profit
Corporation, and FELIX ESPOSITO,
Individually,

Case Number:1:04-12238-JLT

Plaintiffs,

v.

GSH LODGING, LLC, a Delaware Limited
Liability Company,

Defendant.

**MOTION FOR EXTENSION OF TIME TO FILE VERIFIED APPLICATION FOR
ATTORNEYS' FEES, COSTS AND EXPERT FEES**

COME NOW, the Plaintiffs, through their counsel, file this motion for an extension of time to submit its Verified Application for Attorneys' Fees, Costs, and Expert Fees, showing as follows:

1. The Honorable Joseph L. Tauro signed the Final Order Approving and Entering Consent Decree and Reference to U.S. Magistrate Judge on August 10, 2005 [DE 20]. However, the signed Order was not entered into the PACER system or received by Plaintiffs until August 15, 2005. (*See Exhibit 1*)
2. Since Plaintiffs were not notified of the signed Order until August 15, 2005, Plaintiffs respectfully request an extension of time until September 5, 2005 to submit its Application for Fees, Costs, and Expert Fees.
3. Plaintiffs' counsel have discussed this matter with Defendant's counsel, who has no objection to requested extension.

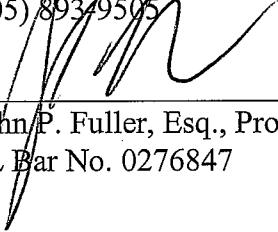
WHEREFORE, Plaintiffs respectfully request that the Court extend until September 5,

2005, the deadline for Plaintiffs to submit its Application for Fees, Costs, and Expert Fees and to enter the Order submitted simultaneously.

Respectfully submitted,

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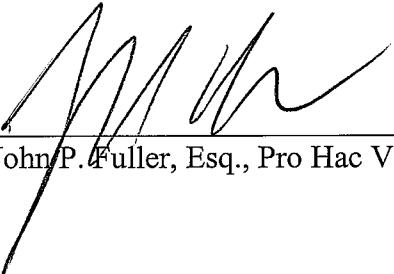

John P. Fuller, Esq., Pro Hac Vice
FL Bar No. 0276847

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been furnished by facsimile on this 23rd day of August 2005 to:

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